

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of:

JOINT PETITION OF CTIA AND RCA	)	
REGARDING THE DECEMBER 31, 2005	)	
DEADLINE FOR LICENSEES EMPLOYING	)	WT Docket No. 05-288
A HANDSET-BASED E911 PHASE II LOCATION	)	
TECHNOLOGY TO ACHIEVE NINETY-FIVE	)	
PERCENT PENETRATION OF	)	
LOCATION-CAPABLE HANDSETS	)	
AMONG THEIR SUBSCRIBERS	)	

**COMMENTS OF**  
**THE NTELOS COMPANIES**

NTELOS Inc. on behalf of itself and its affiliates the Virginia PCS Alliance L. C.; Richmond 20 MHz LLC; and the West Virginia PCS Alliance L.C. (all doing business as, and hereinafter, “NTELOS”) file these comments on the Joint Petition For Suspension or Waiver of the Location-Capable Handset Penetration Deadline filed by CTIA – The Wireless Association and the Rural Cellular Association.<sup>1</sup> The CTIA/RCA Petition seeks relief of the requirement that wireless licensees that employ a handset-based Enhanced 911 (E911) Phase II location technology achieve ninety-five percent penetration of

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<sup>1</sup> See Joint Petition of CTIA – The Wireless Association and the Rural Cellular Association for Suspension or Waiver of the Location-Capable Handset Penetration Deadline, CC Docket No. 94-102 (filed June 30, 2005) (CTIA/RCA Petition).

location-capable handsets among their subscribers by December 31, 2005, as required by Section 20.18(g)(1)(v) of the Commission's Rules.<sup>2</sup>

NTELOS fully supports the CTIA/RCA Petition. Indeed, NTELOS today filed an individual company waiver of the handset penetration deadline. The detail regarding our efforts to meet the 95% penetration benchmark could be helpful to the Commission in its consideration of the CTIA/RCA Petition. Therefore, NTELOS has attached its petition and asks that it be accepted as our comments.

Respectfully submitted,

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Dated: October 21, 2005

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<sup>2</sup> 47 C.F.R. § 20.18(g)(1)(v).

## SERVICE LIST

A copy of NTELOS' Comments in WT Docket No. 05-288 were sent on this 21<sup>st</sup> day of October 2005 by USPS to the parties listed below.

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